

Rickner PLLC

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Via ECF

Judge Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Santiago v. Cuomo, et al.*, 12-cv-02137-KAM-ST

Dear Judge Matsumoto,

I represent Plaintiff Jesus Santiago in the above-captioned matter and I write to request an extension of the time to file a motion for costs and fees under 42 U.S.C. § 1988 and costs under Federal Rule of Civil Procedure 54 and Local Civil Rule 54.1. Pursuant to Local Civil Rule 54.1 a motion for costs must be made within 30 days of the entry of judgment, and under Federal Rule of Civil Procedure 54, an application for attorney's fees must be made within 14 days of the entry of judgment.

Today, following the verdict, Plaintiff orally made a motion for this extension, but after a review of the transcript, it appears there was no ruling. Consequently, Plaintiff asks that this Court extend the time to make a motion for costs and fees until 14 days after the last motion and/or appeal. This will reduce the burden on the Court and the parties by ensuring that only one motion, for all relevant costs and fees, needs to be made, after all the defendants motions, and potential appeals, have been resolved. Defendants consent to this request and it is the first request to extend this deadline.

Respectfully,

/s/

Rob Rickner